

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

APPLICANT(s):	Soderbacka et al.	CONF. NO.:	3543
SERIAL NO.:	10/024,121	ART UNIT:	2617
FILING DATE:	12/18/2001	EXAMINER:	Smith, Sheila B.
TITLE:	INTERSYSTEM HANDOVER OF A MOBILE TERMINAL		
ATTORNEY			
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Mail Stop AF
Commissioner of Patents
P.O. Box 1450
Alexandria, VA 22313-1450

REQUEST FOR PRE-APPEAL BRIEF CONFERENCE REVIEW

This is in response to the Final Office Action mailed 6 June 2007 and Advisory Action mailed 11 September 2007. A Notice of Appeal is filed herewith.

Claims 1-5, 7-13, 15,17-32 and 34-35 are rejected under 35 U.S.C. §103(a) as unpatentable over the combination of Byrne, Huang and Suk.

Claim 1 recites that the criterion for the intersystem handover is one of a "requested content", a "requested access point name", a "requested uniform resource location", and a "requested internet protocol address."

The Examiner states that Byrne fails to disclose a "requested uniform resource location". The Examiner also states that the combination of Byrne and Huang does not teach that

the criterion of the intersystem handover is a "requested content". (See OA mailed 6 June 2007, page 3).

The Examiner relies on Suk for the teaching that the criterion is a "requested content". It is respectfully submitted that there is no such teaching in Suk and that this is clear error.

The Examiner states that "requested content" as claimed by Applicant can be read on by the "handoff request message S2" of Suk. This cannot be.

A request for content is exactly that. A "handoff request message" is not "requested for content".

A "handoff" is the process of transferring an ongoing call or data session from one channel connected to the core network to another. A "request for handoff" is thus a request to transfer an ongoing call or data session. It is not "requested content".

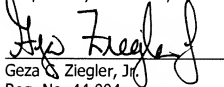
"Requested content" as claimed and described by Applicant is not the same as the "handoff request message" described by Suk. As claimed by Applicant, information that an intersystem handover should be performed can consist either in a direct request by a mobile terminal or a specific radio access technology, or in an information from which the necessity of a handover can be derived indirectly in the network. For enabling a direct request, for instance, preferred radio access technologies can be stored in a list in the mobile terminal. This list may indicate which service or content is to be requested via which radio access technology. A corresponding indication is then transmitted by the mobile terminal for each desired content or service. The mobile terminal can communicate the preferred radio access technology to the network in particular in a new information element added to the currently existing connection establishment signaling, or in a new message added to the signaling sequence. For enabling an indirect request, a list of preferred radio access technologies can reside in a network element of the communication network, in particular the home location register (HLR) of the mobile terminal. If the radio access technologies are associated in this list for example to

specific contents, services, types of contents or services, or access point names (APN), a content, a service or an access point name requested by a mobile terminal can be used for selecting a radio access technology from the list stored in the HLR. (See paragraph [0021 – 0023] of Specification).

Thus, as claimed and described by Applicant, there is a clear difference between “requested content” as claimed and the “handoff request message” of Suk. The application of Suk to the rejection of the claim is thus clear error since there is no disclosure related to a criterion for an intersystem handover being one of a “requested content”, as claimed. Review and correction is requested.

The Commissioner is hereby authorized to charge payment for any fees associated with this communication or credit any over payment to Deposit Account No. 16-1350.

Respectfully submitted,


Geza Ziegler, Jr.
Reg. No. 44,004

9 OCTOBER 2007
Date

Perman & Green, LLP
425 Post Road
Fairfield, CT 06824
(203) 259-1800
Customer No.: 2512

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I hereby certify that this correspondence is being transmitted electronically on the date indicated below and addressed to Mail Stop AF, Commissioner of Patents, P.O. Box 1450, Alexandria, VA 22313-1450.

Date: 9 October 2007

Signature: Shannon D'Amico
Shannon D'Amico